

# Exhibit J

1 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 IN AND FOR THE COUNTY OF ALAMEDA

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4 ROSALINO REYES and GEMMA REYES,

5 Plaintiffs,

6 vs.

No. RG20052391

7 JOHNSON & JOHNSON, et al.,

8 Defendants.

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13 TELEPHONIC DEPOSITION OF WILLIAM E. LONGO, Ph.D

14 Volume II

15 September 25, 2020

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22 Job No: 4272256

23 Taken before JANICE L. BELCHER

24 CSR No. 12342

25 Pages: 79 - 248

Page 79

1 BY MR. HYNES:

2 Q. But first, you mentioned that in order to see  
3 something that -- in order to see chrysotile PLM in one  
4 of these cosmetic talc preparations, an analyst needs to  
5 have appropriate to training in order to see it, and my  
6 question is to you is, the person who is performing this  
7 PLM analysis for the 72 samples that we're talking about  
8 that we're part of Exhibit No. 11, was that mainly or  
9 entirely Paul Hess?

10 A. That was entirely Paul Hess.

11 Q. Okay. How many years of experience does he  
12 have analyzing materials like PLM?

13 A. 30 years.

14 Q. Okay. And is it your testimony that in 2018,  
15 when he was performing those PLM analyses on the 72  
16 samples with refractive index oil of 1.550, he would not  
17 have adequate training or experience to identify  
18 chrysotile if it was present in those 72 samples?

19 A. No. You're taking it out of context. We never  
20 we're analyzing for chrysotile, and you can't take this  
21 10 to 20 minute just verify that the fibrous talc is  
22 there, that we were analyzing the sample in 1.550.

23 Cosmetic talcs are milled extensively. Our  
24 second analyst that we did train, he has over 30 years  
25 experience, and when he took the McCrone cards, it was

1 back in the time when Walter McCrone taught it himself,  
2 and they were dealing with asbestos added products,  
3 where the chrysotile is these very large bundles, you  
4 know, like the silly examples that Dr. Sanchez uses when  
5 he says this is what it ought to look like.

6 It wasn't until we started, we looked at the  
7 calidria and used that as a standard where the analyst  
8 now knew that it had asbestos in it, but the Calidria  
9 bundles, the size ranges in there are very similar to  
10 the size ranges of the chrysotile in the sample. So  
11 they had to know what to look for. And I don't think,  
12 and so we could train any analyst and they would have to  
13 have decades of experience. And of course you have to  
14 have the kind of setup we have with our PLM scopes, so  
15 this is reproducible.

16 But those MDL samples, to say we looked at them  
17 in 1.550 and didn't find chrysotile, you know, that's a  
18 misrepresentation of what happened.

19 Q. With respect to the Korean or the Philippine  
20 market containers, so you're saying that the table I'm  
21 looking at, Exhibit 10, page 8, Table 1, if we look at  
22 that, so the narrative above where -- I guess, let's  
23 start there, let's start at the narrative.

24 Page 3 of 15, the narrative discussing sample  
25 002, specifically notes, the second sentence there

## REPORTER'S CERTIFICATE

I, JANICE L. BELCHER, do hereby certify:

That WILLIAM E. LONGO, Ph.D, in the foregoing deposition named, was present and by me sworn as a witness in the above-entitled action at the time therein specified;

That said deposition was taken before me at said time, and was taken down in shorthand by me, a Certified Shorthand Reporter of the State of California, and was thereafter transcribed into typewriting, and that the foregoing transcript constitutes a full, true and correct report of said deposition and of the proceedings that took place;

IN WITNESS WHEREOF, I have hereunder subscribed my hand this 5th day of October, 2020.



JANICE L. BELCHER, CSR No. 12342

State of California